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ABSTRACT

Guidelines for coordinators of programs under Title III of the Higher Education Act of 1965 are presented, based on a national survey of Title III program coordinators. The responsibilities of the coordinator and information on administering the Strengthening Developing Institutions Program (SDIP) grant are covered. The program can either be a special project administered separately from existing institutional programs or can be integrated into the established structure and operation of the college. Whether the role of the coordinator is that of a line officer or a staff officer, some common responsibilities can be identified. The coordinator serves as the link between the college and the Department of Education, between the college and other SDIP institutions, between related units on the campus and the president, and among the activity administrators. In addition to serving as advisor to the college president, the coordinator serves as a grant manager in establishing an orderly and efficient office, monitoring the budget, assisting agency and cooperative arrangements, and ensuring that program evaluation is conducted competently and that reporting requirements are met. The plan of action for implementing the grant covers the following: office space; staff; housekeeping; fiscal accounting; cooperative arrangements, assisting agencies, and consultants; policies and procedures manual; monitoring and evaluation; unallowable costs; site visits; fiscal audit; and close-out procedures. Appended are a glossary, information on the history of Title III, and references for the program. (SW)

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GRANT ADMINISTRATION MANUAL

FOR

TITLE III

COORDINATORS

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TITLE III

COORDINATOR'S MANUAL

Recommended for use in grant coordination by the National Association of Title III Administrators

PREFACE

For many institutions the successful development and submission of a grant proposal under Title III of the Higher Education Act of 1965, as amended, is a critical first step in acquiring the funds needed to prepare for a challenging future. There is no question that American higher education faces a future quite different from the recent past. It also seems clear that institutional survival, development, and viability can be significantly influenced by the way a Title III grant is utilized.

This brief document, prepared by two individuals with direct, "hands-on" experience in administering a Title III grant, is based on a survey of Title III program coordinators across the country. The survey, which achieved a remarkable response rate, asked the coordinators to identify the types of problems they actually confronted in administering a grant, and to describe the procedures and solutions they developed to prevent these problems from reducing its constructive impact. From this information the authors have produced a concise, adroitly written guide that presents the most effective general ways to proceed with grant implementation and administration. In sum, the guide provides a wealth of pragmatic and useful advice for every Title III coordinator and should be particularly valuable for new coordinators and new grantees.

We at the Academy for Educational Development, based on providing services as an assisting and evaluating agency for numerous Title III grantees, are sensitive to the complex set of obstacles that the Title III coordinator must overcome to fulfill successfully the terms of the grant.

While we believe this document will help achieve the potential of the grant on many campuses, we should underscore the need for all coordinators to develop a good working relationship with their program officers at the Department of Education. The program officer is the only reliable source of information for specific questions.

Although the new regulations of the Higher Education Act of 1980 (which will take effect in the winter of 1981) will result in changes in certain procedures and eligibility criteria, the concepts and approaches described in the manual will continue to be valuable.

We are hopeful that the concepts presented here will facilitate implementation of the grant and enhance the impact of Title III grants.

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Senior Vice President and
Director, Management Division
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The information in this document reflects current guidelines for Title III programs. Regulations and procedures are valid as of this publication date; however, they are subject to change and should be monitored.

October 1980

I. INTRODUCTION

CONGRATULATIONS—Your institution has just been funded by the Department of Education under Title III-SDIP. Your president has appointed you to coordinate the grant and even though you may have helped to write the proposal, you may wonder how that marvelous document relates in any way to the myriad regulations, procedures, revisions, and office management details that cover your desk.

RELAX—Help is on the way. This little manual has been prepared by two who have been there, and after much consultation with some who are there now. We have tried to include the kinds of information you can use or adapt, as well as tips on how we learned to make our job easier—and that we wish we had known sooner! We have addressed the most elementary topics and a few of the more sophisticated ones. The monograph is divided into two main parts: the first explains the role of the coordinator generally, and sometimes philosophically; the second addresses the "nuts and bolts" of program implementation. In preparing this monograph we realize that a great deal has been left unsaid—and deliberately so. Coordination in Title III-SDIP is a role unique to each institution but executed through the established guidelines of the program. It has been said that there is no right way—just a good way, a better way, or the best way. Our purpose has not been to answer technical questions (these should be addressed to program/grants officers) but rather to provide a "feel" for the program and to share with you some general practices and suggestions you might use to find the best way for grant coordination at your institution. We strongly believe that good administrative practices, a knowledge of program regulations, an understanding of your particular campus climate, and common sense are the components which will ensure your success as a coordinator.

We hope you will find our work useful and that you will share it with other new coordinators who are experiencing the initial trauma of program implementation.

II. ROLE OF THE COORDINATOR

The SDIP coordinator has a leadership role that will determine to a large extent the success of the program on a campus. Because the managerial style and philosophy of the administration at a given institution will determine the position of the coordinator in the governing hierarchy, each position will be somewhat unique. Generally, however, one of two models is used in the administration of an SDI Program.

The first is an adjunct model in which the program is viewed as a special project administered separately from the previously existing programs of the institution. In this instance the coordinator becomes in effect a project director, an administrator in its truest sense. In this situation the coordinator is a line officer with all activity directors reporting to him/her.

The advantages of such an arrangement are that one person has full re-

sponsibility and authority for the program, the program is centralized and thus easier to monitor, and the program has high visibility. The chief disadvantage is that creating an administrative office as an appendage to the existing structure will retard integration of the program into normal college activities. Integration is almost certainly a necessary prerequisite to the effective development and implementation of fund replacement strategies to ensure continuation of Title III programs beyond the grant period.

The second model is one in which the SDIP activities are integrated into the established structure and operation of the college. In this instance the program officer is, as the title suggests, a coordinator or facilitator serving as staff officer and catalyst. Tact and skill in interpersonal relations are assets to this coordinator because (s)he has no absolute authority, only that implied by the direct line to the president. This coordinator must strive to establish a good working relationship with the chief administrators of the college and rely on the line officers to administer the SDIP activities with the same care as the other college programs for which they or their staff are responsible. The coordinator then monitors programs and works closely with the line administrators.

The chief advantage of the second model is that divisions or departments in which activities are situated tend to assume ownership, thereby maximizing fund replacement efforts at the unit level and ensuring program continuation beyond the grant period. Also the administrative merger with college operations tends to secure the program's position within the institution.

Although this model seems preferable, it is not without some disadvantages. Decentralized administration complicates the coordinator's job because even though (s)he has the responsibility for managing the grant, activity control is situated outside the coordinator's office. Realistically, however, the coordinator has the power of money, and expenditure of all SDIP funds requires the approval of the coordinator and must be routed through this office. Therefore, temporary withholding of such approval can be a very effective technique in encouraging necessary cooperation. Caution should be exercised in using budget control as a management tool; it should not be used as a power play. For example, if an activity director neglects to complete the report of travel forms identifying the purpose of the trip, the outcome, etc., in a reasonable time after returning to campus, the coordinator routinely should withhold approval for any additional trip expenses in that particular activity until proper documentation of the previous travel has been received.

It should be remembered that persons who assume directorship over activities often do so in addition to their normal responsibilities; therefore they do not always place the same priority on keeping accurate records and complying with established timelines and reporting procedures as does the coordinator. Good public relations with all involved persons are paramount to assuring effective monitoring and timely accumulation of information necessary for program evaluation and completion of reports both within the college and to the Department of Education.

Whether an institution adopts an appendage model, an integrated model, or some variation, the role of the coordinator in determining the success of the grant is vital. Whether the role is that of a line officer or a staff officer, some common responsibilities can be identified.

LIAISON

Performing essentially a four-fold responsibility, the coordinator serves as the link: (1) between the college and the Department of Education (ED), (2) between the college and other SDIP institutions, (3) between related units on the campus and the president, and (4) among the activity administrators.

It is imperative that the coordinator be thoroughly familiar with the regulations which govern the SDI Program (see section III). This requirement is first and foremost and cannot be overemphasized. The coordinator is the Title III "expert" on campus and must be well versed in order to advise the president and his/her constituents. Assuring compliance with Department of Education guidelines for the program is the exclusive responsibility of the coordinator acting as the president's agent. If circumstances arise wherein it appears compliance is doubtful, the president should be notified, and the area in question should be documented in the coordinator's files along with efforts undertaken to remedy the situation.

Other responsibilities include the forwarding of information from the college to the Department of Education usually through the accurate and timely completion of the required reporting forms. Other items requiring communication with ED include requests for reallocating funds (10 percent or over of a single year activity budget), purchasing additional equipment at $200 per unit, deleting or adding personnel, dropping a funded activity, changing the scope of work, entering into a contractual agreement or altering an existing one, or modifying the documented college (other sources) contribution.

Secondly, it is important for the coordinator to know what is happening at other SDIP institutions. Identifying colleges that are experiencing successes and difficulties in various areas and learning how they are coping or adjusting can be a very reinforcing experience. Coordinators should avail themselves of every opportunity to meet with other coordinators and attend informational sessions sponsored by associated groups. (Remember this when constructing the travel budget.) You may not learn something new at every session, but it is very reinforcing to find that using your own resources independently, you have arrived at some of the same conclusions as others who may be more experienced in the program. There is also value in commiserating over the same problems to which solutions have not yet been found. Try to find a seasoned coordinator or two whom you can call just to discuss a situation. We all need advice occasionally, and you will find most coordinators empathetic and happy to help.

Avail yourself of opportunities to serve on advisory SDIP committees, to make presentations at conferences or consortia meetings, and to provide input whenever an occasion arises. Such occasions give visibility to your institution and enhance its image at regional or national gatherings.

A third liaison function of the coordinator involves campus units. One responsibility is to establish advisory committees. Usually a general advisory committee of no more than 10 people is needed, to include representatives from administration, faculty, and student body who are directly involved in or at least well informed of the SDI Program. The group can provide input to the coordinator and the president on the advisability of altering a goal, reallocating funds, revamping an activity, and so on. If an

information system is funded—as it usually is in SDI Programs—a MIS advisory committee composed of people who are thoroughly familiar with the goals and long-range plans of the institution is an absolute necessity. Contrary to common belief, an understanding of computers is not a prerequisite for membership on this committee. Its primary function should be to assist in setting institutional priorities on information needs.

Caution: Without such a committee the "computer people" on campus may tend to usurp the equipment's capability on their pet projects, thereby leaving some real needs unaddressed. Although these committees may meet only two or three times a year, they serve a vital function and should be established early in the grant.

Finally, there is a need for regular communication among activity directors. Some coordinators schedule meetings as often as once a week; others meet monthly or bimonthly. This is an individual decision, but generally, regular short meetings are best at first. Later, when the activities are underway and functioning smoothly, meetings can be scheduled less frequently. Some coordinators prefer to arrange a regular schedule with the understanding that the meeting will be cancelled if there is no need for it. People will appreciate your effort to confine meetings to times when there is a real agenda, and they will attend more willingly. Never meet just because a session has been scheduled.

Because there are some items of business that need to be discussed or worked out individually, the SDIP coordinator should be easily accessible. Try to establish an informal pleasant atmosphere where people feel welcome and be as helpful as you can; this applies to your office staff as well. You are a coordinator and a facilitator and good PR is your biggest asset. If you interact easily on a day-to-day basis with those working on grant projects, you will be a more effective administrator and advisor to the president.

ADVISOR TO THE PRESIDENT

The coordinator's role as advisor to the president is important and is an expansion of the liaison function. The president's leadership and active participation in the SDI Program is essential to its success. It is imperative that (s)he be involved in the planning and coordination from the beginning, and that (s)he be well informed on the guidelines in general and the particular implications for his/her own college. Most presidents rely on the coordinator's expertise and charge him/her with the responsibility for anticipating difficulties, reporting on areas of concern, assisting in determining and effecting solutions to problems, recognizing successes and areas for potential advancement, and monitoring fund replacement strategies. A regular schedule for briefings with the president should be established early in the implementation period; once or twice a month for informal sessions probably will be sufficient with brief written reports following quarterly or semi-annually. In addition, the coordinator routinely should have frequent, personal, direct communication with the president. Such a relationship is essential to effective program operation.

GRANT MANAGER

Although the coordinator may have inherited the grant without having had part in writing the proposal, it is incumbent on him/her to become in-

timately acquainted with every facet of the plan of operation and to have a working knowledge of the original proposal.

The most important first step for the coordinator as a grant manager is the establishment of an orderly and efficient office (see section III). Then proper time can be devoted to the following areas.

- **Budget**
  The coordinator will monitor all program expenditures and approve those which have been signed by the appropriate activity director or otherwise processed in accordance with established policy. Individual activity budget changes should be subject to the approval of the coordinator and in compliance with program guidelines. Quarterly or semi-annual budget reviews should be conducted to detect disproportionate spending within activities (i.e., except in unusual circumstances 75 percent of the year's budget should not be spent in the first quarter, nor should 75 percent remain in the last quarter).

- **Assisting Agency and Cooperative Arrangements**
  The coordinator generally prepares the specifications and requests for proposals for the assisting agency. (S)he plays an important role in the final selection and monitors the services to ensure compliance with negotiated contracts. All contracts must meet ED requirements which appear in the application for grants document and must be submitted to the program officer. In addition, all cooperative arrangements will be verified and monitored by the coordinator.

- **Evaluation**
  Since an independent external evaluation is a program requirement, it is the coordinator's responsibility to ensure that a competent agency (college, group, consultant, etc.) is selected to perform this function. Specifications and bid solicitation are the accepted procedure as with assisting agencies. It is important to select an evaluator that can document expertise in every activity funded and is experienced with your particular type of institution. Most colleges arrange for two visits yearly, especially in the first year or two of the grant. A process evaluation at mid-year, followed by a product visit at the year's end is often a good choice. As the grant begins to wind down, one visit per year may be sufficient, although some colleges opt for only one yearly visit throughout the funded period. If help is needed to identify appropriate agents from whom to request proposals, any coordinator who has been in the program a year or two will be able to provide several leads.

  Before contracting with any agency for anything ask for references and call other coordinators for recommendations.

  A system of internal evaluation also should be developed if an effective one is not functioning at the institution. This may not be a popular cause, but it is a necessary component of good management. Evaluation measures that identify outcomes rather than simply document activity will serve as barometers of real success (i.e., did department heads attend three sessions on zero-based budgeting or did they actually learn to construct such a budget for

their departments for the next year?). Cyclical evaluation followed by a needs assessment will provide a sound foundation for planning on an ongoing basis, and it is a procedure recommended college-wide.

- **Plan of Operation**
  It is incumbent on the coordinator to ensure that the program is true to the mission and goals of the college and that the funded activities are implemented in compliance with the approved plan of operation.

  Further, it is the coordinator's responsibility to ensure quality and consistency in the reporting forms. For this reason, (s)he should be involved in the preparation of objectives, performance evaluation measures, and milestones for all funded activities. A good set of reporting forms can serve as an effective management tool—a monitoring device for the coordinator. If it is a multiyear grant, the coordinator is responsible for reviewing and revising, as needed, the current year's plan and accompanying budgets and submitting the required forms to ED in accordance with published deadlines.

CATALYST

The coordinator's role goes beyond the functions of managing, monitoring, and reporting; it is a leadership position that calls for a dynamic, progressive administrator. The coordinator should interact with every area of the college, and should be involved in college planning and merging the SDI Program into the plans, in identifying educational trends that will affect the college, and in helping to formulate strategies for maximizing college strengths to ensure future viability. In addition to overseeing the day-to-day activities of the grant, the effective coordinator will provide impetus and direction to the program.

III. PLAN OF ACTION FOR IMPLEMENTING THE GRANT

OFFICE SPACE

At the very minimum, grant coordination will require two office rooms —one for the coordinator and one for the secretary. If possible, the office should be physically located near the administrative offices of the college so that the coordinator will have easy access to the president and to the business office. Try to stretch your budget to cover the cost of a straight line telephone unless your campus is different from most, where the phone service is already overloaded. You obviously will need the usual office equipment (desk, file cabinets, typewriter, calculator) but in addition, try to gain close access to a good copy machine—you surely will need it.

STAFF

You need a secretary/assistant—not a clerk typist. Find someone who can *think* and who is interested in the grant and wants to learn about Title III and SDIP. No coordinator can possibly keep current on all Federal regulations and a good secretary can be a resource person for the grant coordination. If the coordinator and secretary can work as a team, the

SDIP activities will flow smoothly with a minimum of inconvenience for the busy activity directors.

HOUSEKEEPING

It is impossible to say too much about the need for an effective SDIP office. The program is going to affect in one way or another every person on campus, and the very best insurance for your reputation as coordinator is to have an office that is efficient, cooperative, and well managed. Be knowledgeable about all the activities and the budgets for each; be aware of planned consultant visits; know what activities have people traveling and be interested in their findings when they return; and stay in touch by phone or personal visit with activity directors. An informal newsletter two to three times a year that contains news of all the SDIP activities and the coordinator's office and is distributed across campus can help to keep the grant visible and remind everyone that the office is on its toes.

Establish timelines and hold to them. One good way is to construct a calendar of red letter dates (include regular meetings of activity directors, advisory council, etc.; date reports will be due; any items that will help people plan their calendars in advance) and distribute the calendar early in the school year. Keep your own records in order; always be able to answer questions or find the answers quickly.

Organize your files. Have available as needed the various forms required for documenting grant expenses. Make lots of copies of the reporting forms for the required submission to ED (these can be found in *Instructions and Forms for Submitting Monitoring and Evaluation Information,* OE Form *1049-2,* 7/79) and if this booklet has not been received within a week or two after grant notification, ask your program officer to see that you receive it. Having all the necessary "tools" for the activity directors as they need them will create good will and reduce the "nuisance" feelings you will encounter as you have to ask for reports, documentation, etc.

Order a rubber stamp of your grant number (this number appears on your official grant notification document); the stamp only costs a few dollars, and it will save time as every bit of correspondence you have with ED needs to have this number on it.

Begin a telephone number file with addresses—of the offices at ED and of other coordinators with whom you might share concerns and/or successes. Make as many contacts as you can, and get involved in the organizations and meetings with other coordinators. You can pick up a wealth of information just by talking with others involved in similar projects.

Contacts in Washington can be extremely helpful. In addition to the people you know at the Department of Education, you will be able to get a tremendous amount of assistance from the office of the member of the House of Representatives from your district. If (s)he has a local office in your city, get to know the staff there, and whenever you are in Washington make a point of stopping by his/her office and leaving your card, even if the representative is not in. Establishing a rapport with that office can be of tremendous help to you and your college. Find someone at ED who can help you with the million questions you are going to have. Be prepared to *be patient.* Sometimes you will not receive an answer right away (and you

may think never), but keep trying and document your calls. You will be amazed how easy it is to forget what someone said.

Immediately after a call to ED write a brief summary of the conversation, include the name of the person to whom you spoke, date it, and put it in the ED file folder. If some agreement on program or budget revision was reached, send the person a brief letter confirming your understanding of the agreement. This not only will document your actions, but will give your contact an opportunity to respond if you are in error. You also may include two copies of the letter, one marked college file and the other ED file, and ask for a stamp of approval on the college copy.

If there is absolute urgency, you might decide to register the letter to document its receipt and include the phrase, "if I do not hear from you by (insert date) I will assume that my understanding is correct and proceed." Such a practice should be used with discretion, however, because the college is held responsible for all regulations—even those you may not have known about or the ones on which you may have assumed approval.

Cultivate your friends on campus—remember that SDIP is going to "make waves" and not everyone is going to be enchanted by it. Bend when you can to accommodate requests, BUT do not act outside the guidelines.

Your best friend on campus can be the business manager (fiscal officer). This grant is going to require a good deal of additional work in the business office, and your tasks will be easier if you have a good working relationship with the staff. Find out what you can do to lessen their load and simplify yours and still maintain the required documentation. One suggestion that has worked for some colleges: require that all expenditures of the grant be authorized and signed by the activity director and sent through the coordinator's office for recording in a simple account book. Keep all documentation in the coordinator's office to reduce the amount of paperwork sent to the business office and simply forward the coordinator's authorized payment request to the office.

If you do not already know, determine what the fiscal procedures are for your school: whether purchase orders are required; how to handle check requests and how far in advance to make requests; what the policy is on advances for travel expense; what the college per diem is; and on and on and on. Find out all you can; you cannot know too much. *NOW*—follow the established college policies—do not invent new ones just for SDIP. Most colleges have policies which can be expanded to accommodate the grant guidelines and somehow there is less resistance to minimal change.

Learn about EDGAR (Education Division General Administrative Regulations)—the Federal guidelines that govern your grant. You should have several copies of this in your office; if you do not have them already, they are available just for the asking from the Department of Education. SDIP grants are subject to EDGAR in 45 CFR Part 100a which applies to direct grants. All programs are also subject to the general definitions in 45 CFR Part 100c. In addition Part 169 and Part 74, Administration of Grants, are applicable to SDIP grants.

Get the necessary copies. Keep one on your desk and encourage the secretary to keep one on hand—then READ, READ, READ, until you know and understand the guidelines. Learn the information thoroughly so you do not have to search for answers as questions arise. There are specific

do's and don'ts for SDIP, and if you know them on the front end not only will you save time, more importantly you will appear *smart!!*

A word of caution: there are also some policies which are SDIP office policies and do not appear in EDGAR. Legislation is broad, thus necessitating the development of specific policies by the agency responsible for the implementation. In addition, program and grants officers have considerable discretionary power and negotiation may be necessary. It is not always easy to determine just which is office policy and which is EDGAR, but it does not hurt to ask. It is appropriate when you do not understand a regulation to ask your program/grants officer to refer you to the section in EDGAR to which the office policy relates. Remember that they are there to help you and they are concerned with making the best use of Title III funds. Make the best use of that common interest.

FISCAL ACCOUNTING

Fiscal accounting and documentation of the use of Title III funds cannot be overemphasized. Account numbers should be assigned specifically for SDIP activities and should include a method for adding a digit which will document funds expended as institutional contributions (other sources). A monthly reconciliation of the expenditures in each activity is a must, and working with the fiscal officer at your college, arrangements should be made to provide a print-out or ledger sheet to each activity director on a monthly basis. The coordinator's office should be responsible for reconciling the total grant expenditures with the business office each month. Form *269 Financial Status Report,* which is submitted twice yearly to ED, is a good source document for the coordinator as it reflects not only expenditures for the current reporting period but also cumulative Federal and non-Federal expenditures for each activity.

Support documents for expenditures must be carefully maintained (e.g., airline tickets, receipts for food and lodging, other travel expenses). Reports from consultants and assisting agencies, invoices covering supplies and equipment, in fact, all Title III funds should be fully supported by valid documents. The documentations of time and effort of personnel supported by SDIP funds is equally important, and 100 percent of time for such personnel should be certified.

Activity budget revisions may be made when necessary and should be submitted through the coordinator's office to the grants officer when the revision exceeds 10 percent of the activity funds in a grant year, or when personnel changes or the thrust of the activity are involved. Revisions for less than 10 percent may be made with approval from the coordinator's office.

A clear audit trail (an established accounting procedure for documenting the transfer of funds) for any funds transferred must be maintained. This audit trail must include a justification for the transfer of funds and identify the line items and amounts involved. Budget revisions which involve reallocation of funds between activities must be submitted to ED and the information supplied should be detailed (e.g., if additional equipment is being requested it should be identified specifically along with the relationship it bears to the achievement of a stated goal; the total amount in the activity budget should be shown before and after the transfer of funds). The reallocation process should be easily understand-

able and justifiable to anyone working with the grant at ED or in the event of a fiscal audit.

Monitoring and documenting the expenditures of institutional contributions (other sources) is as important as overseeing the use of SDIP funds. The college contribution is subject to audit, and any change in the original budget should be reported to the grants officer along with an explanation for the change. This is particularly important if the college is unable to fulfill its obligation for any reason.

COOPERATIVE ARRANGEMENTS, ASSISTING AGENCIES, AND CONSULTANTS

While these terms may seem to be interchangeable at times, they are different and distinct and should not be confused. (See Glossary for definitions.) A cooperative arrangement is required for each funded activity. Pending legislation may alter this requirement for future grants, but it is effective for current multiyear grants. It is assumed that an institution with the in-house expertise necessary to advance sufficiently an area would have accomplished that goal without Title III assistance. A cooperative arrangement may be made with an institution of higher learning, an organization, agency, or business entity. An organization, agency, or business entity is considered to be an assisting agency (Senate Report 96-247). The external evaluation of the grant, however, must be performed by a separate agency or consultant—the same agency or consultants cannot assist *and* evaluate.

This is not to say that assistance for each activity must or should be performed by a different institution or agency. Certainly there are institutions, agencies, etc., comprehensive enough to provide guidance in a wide variety of funded activities; therefore, it is quite possible that a college having several funded activities would be working with only one or two outside agencies, but those agencies would assist in several, or perhaps all funded areas. Competitive selection should be used. If, however, an institution opts for a noncompetitive selection, the grantee must provide a written justification for each selection.

Whatever the case, an assisting agency should be selected with care and the credentials examined of the persons who will be working with the college. Expertise from off campus often can be the catalyst to move the institution in the direction it wants and needs to go; the objectivity of an assisting agency is invaluable. Care should be taken, however, to assure that the agency is assisting the college and not directing it. The guidelines which appear in the Application for Grants document, if followed, will ensure that the administrative officers of the institution retain control and supervision over the services provided.

A consultant, for the purposes of SDIP, generally is considered to be an individual who provides a service on an as-needed basis. This person is paid by the day (as opposed to contracted) and payment for such services is limited to $100 per day plus expenses unless prior approval has been received from ED. (Payment for this service is budgeted in the "Other" line item.) Most consultants will require a day off campus for every two or three days on campus. Usually some time is spent reviewing materials prior to a campus visit, and additional time is required to evaluate and write a follow-up report of the visit. Again, consultants should be selected for their recognized expertise in the areas required

and payment authorized only after the consultant submits a detailed written report of his/her findings.

UNALLOWABLE COSTS

There are a few clear and consistent restrictions on the use of SDIP funds. These include construction of buildings, payment of recruiting costs, direct fundraising, cultural events, and supplanting of college funds. Other items which may be frowned upon are some kinds of equipment and trips to Washington for the sole purpose of visiting ED. It should be remembered, however, that the purpose of the grant is to advance the institution and assist it in the accomplishment of its goals. It is therefore incumbent upon the institution to demonstrate that its requests are essential to the attainment of those goals.

POLICIES AND PROCEDURES MANUAL

There is no better way to ensure orderly compliance with SDIP guidelines than to construct very early in the grant a policies and procedures manual. This should contain samples of all forms required for documentation of expenses and time, as well as serve as a handy reference to everyone working on the grant of the correct procedure for handling day-to-day business. The manual does not need to be elaborate; it needs to be functional. The number of pages should be kept at a workable minimum; use a loose leaf binder to allow for easy revisions. This manual, however, is no place for excerpts from EDGAR or the philosophy of the college.

You might begin with a letter from the president confirming his understanding of the importance of fiscal accountability and emphasizing his expectation that everyone will comply with the procedures even when they seem cumbersome. This support from the top helps ensure the cooperation of those involved in the grant operation.

Include job descriptions for the coordinator and activity directors and a chart of the administrative structure of the college showing the position of the coordinator in that structure. Include a brief description of the function of the SDIP Advisory Council, if one exists (and it certainly should), and then address specifics. Carefully, but briefly, spell out your college's method for ensuring that activity expenses are limited to approved budget items. Clearly state the purchasing procedure and how payments will be processed. List the assigned SDIP account numbers including the numbers for documenting institutional contributions.

You will need a way to document bidding for items over $200 and a way to maintain an inventory record of equipment purchased with SDIP funds. Include, too, instructions for clearly marking all equipment as purchased with SDIP funds. If your college does not have a system of inventory control which you can adapt to the need, a very simple form can be devised to record the description of the equipment, the cost, location, and use of the equipment. (Requiring this form to accompany requests for payment of invoices for equipment will ensure compliance.)

Construct a simple form to document requests to transfer money from one line item to another. Clarify the personnel practice you will use to maintain time/effort reports. Clearly spell out travel procedures—how you will handle advances, reimbursements, proof of expenditures, college per diem, report of travel, etc. Address consultant practices—what

is required before making payment for services and how to secure reimbursement for consultant travel costs.

The list of suggestions for the manual can go on and on, but it obviously should contain the kinds of information that will assure compliance with grant guidelines while adapting itself as much as possible to the existing practices on your campus. Most coordinators who already have developed a manual will be glad to send you a copy and this will serve as a helpful pattern for your own. The primary importance is the distribution of the information early in the grant implementation so that everyone is informed about and using the same procedures.

MONITORING AND EVALUATION

Monitoring and evaluating the SDIP grant should be an ongoing process for the coordinator to assure progress toward the institution's defined goals and objectives. Reports from the external evaluator, as well as the findings of the internal evaluation system, are used to document the process. The formal reporting to ED is accomplished through *Report 1: Activity Monitoring Report, Report 2: Activity Evaluation Report,* and *Report 3: Supplemental Monitoring and Evaluation Information.* Instructions for dates when submissions of these reports are due are shown in Attachment B of the Notification of Grant Award.

In monitoring and evaluating SDIP grants, the interest and involvement of the president is vital, and it is to him/her the coordinator will report concerns and successes. With his/her support the necessary changes can be accomplished much more easily. (See section II for additional information.)

SITE VISIT

A site visit usually is initiated from the Department of Education although it may result from a request by an institution wishing to share some successful programs. Contact with the coordinator is made by ED staff several weeks prior to the visit to arrange a mutually convenient time. If possible, you should talk directly with the person coming to your campus and offer whatever assistance you can with his/her arrangements for the visit. Do not hesitate to ask for a specific agenda; find out whom the visitor expects to interview and the general questions to be addressed.

The purpose of a site visit is to assess the progress of the institution toward successful implementation of the funded activities. It usually begins with an entrance interview with the coordinator and the president, includes interviews with activity directors, and ends with an exit interview with the president (and coordinator if desired). The site visitor will be interested in seeing SDIP fiscal records, contracts with assisting agencies, inventory of equipment, position descriptions, time/effort reports, and any information supporting the implementation of grant activities.

The people on your campus should be provided with all the information you can obtain to prepare for the visit. Do not be apprehensive about it. If you have been a conscientious coordinator and a good administrator, all your activities are ready for review. You probably know better than anyone else where areas of concerns/successes exist, and this visit probably will just confirm what you already have identified. Also, remember the common interest you share with ED—making the best use of Title III funds.

The staff member conducting the site visit is there in your interest and wants to find your program working well.

FISCAL AUDIT

If your institution is selected for a fiscal audit, it will be scheduled by the Department of Education and will be conducted by Federal auditors. The date for the audit will be mutually agreed upon and the fiscal officer of the college will be the person responsible for assigning office space convenient to the business office. The coordinator should assist with any arrangements and be available to provide information as requested. Generally a reconciliation of the monies requested quarterly (DFAS) and expenditures for the grant is made. In addition, documentation for travel, invoices for equipment and materials, payroll records, supporting information for institutional contributions to the grant, etc., are examined and reconciled.

Work closely with the chief fiscal officer of your college when a fiscal audit is scheduled. That office routinely undergoes this kind of audit of college funds each year and should be well acquainted with proper procedures.

CLOSE-OUT PROCEDURES

As the expiration date for your grant approaches there are some procedures which need to be followed for an orderly close-out of all activities. It is important to remember that no expenses can occur after the final date of your grant as shown on the Notification of Grant Award. You may process reports and finalize the grant, but all monies for activity expense must stop as of the grant closing date. *Report 1: Activity Monitoring Report, Report 2: Activity Evaluation Report,* the final report from the external evaluator, and the F-269 *Financial Status Report* are due at ED 30 days after the final date of the grant. Within 90 days a final performance report and a final fiscal report must be submitted.

The final performance report should be in narrative style (not to exceed five pages for one-year grants or 10 pages for multiyear grants) and should summarize all major activities and the overall impact on the institution. The narrative should address the contracts with consultants and/or assisting agencies and detail the extent of their services. Real data should be used to document and support your assessment of the strengthening of your institution by the grant. The progress of the institution should be measured from the period of time immediately prior to the awarding of the grant. The final fiscal report should detail in a summary budget all activity expenses and identify any balance left and payable to the Federal government.

In addition to the requirements for reporting to ED at the close of a grant, there are housekeeping chores on campus. All documents relating to the grant activities *(this should include everything)* should be cataloged and placed in a central location as records must be maintained for a specific length of time (see EDGAR, part 100a 734). Also, CFR 45, Part 74.139 addresses the disposition of equipment and should be read carefully to ensure no violations occur during the close-out procedure.

Now that you have all the answers, why not go out and share them with some other "new" coordinator.

GLOSSARY

Advisory Committee	Selected members of the institution who provide input for proposed changes/reallocations, etc.
Assisting Agency	Organization, association, foundation, or business firm which contracts to provide required expertise in implementing grant
Assisting Institution	Another institution of higher education which contracts to provide expertise in implementation of grant
Audit Trail	A recognized method of accounting practice which documents transfer/reallocation of funds
Authorized Activity	Those activities authorized for funding in a particular grant
Bilateral Arrangement	Strengthening of a single institution with the assistance of one or more institutions of higher education, business entities, or agencies
Budget Notes	Explanation/justification for activity expenditures
CFR	Code of Federal Regulations
Components	Specific and detailed undertakings which contribute to fulfillment of authorized activities
Consortium Arrangement	(1) Two or more institutions agreeing to work together to strengthen each other (2) An arrangement with an institution of higher education, agency, organization, or business entity with the expertise to help a cluster of developing institutions carry out authorized activities
Consultant	Individual contracted to provide expertise/assistance
Cooperative Arrangement	Relationship with another institution, organization, association, foundation, or business firm to provide grantee institution with expertise needed to implement an activity

GLOSSARY (Continued)

ED	Department of Education
EDGAR	Education Division General Administrative Regulations (Federal requirements for administering all educational grants)
External Evaluator	Institution/agency contracted to provide objective evaluation of funded activities
Fiscal Audit	Careful examination by certified auditors of monies expended and records maintained
Form 269	Financial Status Report: submitted to report Federal and non-Federal outlays in activities
Grants Officer	Assigned personnel in Grants Procurement Management Division for program budget
Letter of Agreement	Written agreement of services to be rendered by the assisting institution/agency
MIS Advisory Committee	(Management Information Systems) Selected members of the institution who provide input for computer needs priorities
Major Change	Any activity change which affects 10 percent or more of SDIP funds/personnel for an activity for any grant year
Notification of Grant (NGA)	Official document awarding funds to an institution
Other Sources	Institutional contribution to an activity
Program Audit	Careful examination of activities funded and the progress of implementation of these activities
Program Budget	Budget categories by year for activity
Program Category	Generic term used to denote the four major areas which applications for SDIP may address (e.g., academic program, administrative and management capability, student services, fiscal stability)
ROP	Refined Operation Plan (the narrative supplied to ED after notification that award has been received)

GLOSSARY (Continued)

Report 1	Activity Monitoring Report: activity milestones (see NGA for submission dates)
Report 2	Activity Evaluation Report: activity objectives and performance evaluation measures (submitted annually)
Report 3	Supplemental monitoring and evaluation information to report changes/delays/successes in activities (submitted as needed)
SDIP	Strengthening Developing Institutions Program
Site Visit	Visit by personnel from ED (or their designated representative) to funded institutions to evaluate program—not the same as a program audit
Summary Budget	Total budget categories by year for all activities
Supplanting Funds	Using Federal funds to replace college funds in existing programs—definitely unallowable
Supplies	Consumables with life expectancy of less than one year, costing less than $200 per unit
Title III	Specific portion of the Higher Education Act of 1965 that authorizes SDIP
45 CFR Part 100a, 100c, and CFR 74	Sections of EDGAR applicable to SDIP

BRIEF HISTORY OF TITLE III

Fifteen years ago Congress recognized the critical need to assure that the benefits of a higher education be made accessible to everyone. Title III of the Higher Education Act of 1965 was created to provide Federal assistance for a program to strengthen and improve developing institutions that desired to play a constructive role in providing these benefits.

Title III of the Higher Education Act of 1965 provides for a "program of special assistance to strengthen the academic quality of developing institutions." Specified by the law, 76 percent of the appropriations for each year will be used by four-year institutions and 24 percent by two-year colleges. Amendments to the Act have altered some of the elements of the program, but it remains basically as written—an instrument to provide assistance to institutions demonstrating a constructive effort to strengthen themselves.

The Basic Institutional Development Program emphasized five principal categories of support—administrative improvement, faculty development, curriculum development, student services program, and development programs. These categories were developed through cooperative arrangements, National Teaching Fellowships, and Professor Emeritus Grants. In 1973 the Advanced Institutional Development Program was begun to provide grants to developing institutions to assist with progress toward achieving operation and fiscal stability and participation in the mainstream of higher education. The Basic Program emphasized the development of strengths in instructional support while the Advanced Program supported a major effort in total development.

The Basic and Advanced Programs were combined in 1978 into a single program concept called Strengthening Developing Institution Program which recognizes the infinite variety of strengths and weaknesses of institutions. Thus each applicant may request funds based on its respective needs, and the size and duration of the Federal grant is determined by the focus of the activity. Currently, legislation is pending in Congress to establish new regulations and make major modifications in the program, including eligibility requirements.

REFERENCES

National Association of Title III Administrators

Organization open to coordinators of all Title III schools; provides limited assistance to coordinators; sponsors annual informational meetings.

Contact: Title III Coordinator
Norfolk State University
Norfolk, Virginia 23504
(804) 623-8323

Reference Materials

- *Management, Governance and Leadership: A Guide for College and University Administrators*

  John D. Millett, Executive Vice President, Academy for Educational Development, Inc., presents a synthesis of his basic thinking on the subject of management and organization in a university. Chapters 3 and 4 concerning "The Essentials of Mission" and "The Management Structure of the University" will be particularly helpful to colleges and universities as they begin the planning process.

- *A Guide to the Development of Mission, Goals, Objectives, Performance Evaluation Measures, and Milestones*

  Examples of good measurement tools—available from author/publisher McManis Associates/University Associates, 1201 Connecticut Avenue, N.W., Washington, D.C. 20036 or University Associates, 475 L'Enfant Plaza, Washington, D.C.

- *Federal Register*

  Thursday, April 3, 1980, Part II, Education Division General Administrative Regulations (EDGAR)

  Contains regulations for SDIP—available from Department of Education

- Instructions and Forms for Submitting Monitoring and Evaluation Information

  OE Form 1049-2

  General instructions for submitting report to DE—available from Department of Education

Publications Available from the Washington Office

Admissions/Recruitment: A Study of Costs and Practices in Independent Higher Education Institutions, by Andrew H. Lupton and Kurt D. Moses. (1980) $5.50.

Architectural Accessibility for the Disabled of College Campuses. Includes specifications for walks, doors, ramps, parking facilities, elevators, rest rooms, residence halls, alarm systems, and other aspects of daily campus life. (Revised 1976) $5.00.

Campus in Transition. Includes eight strategies for more efficient management of campus space. (1975) $4.00.

The Challenges in Statewide Planning for the 1980s, by John D. Millett. (1978) Free.

Higher Education Planning, by John D. Millett. (1978) $2.00.

How to Plan a College Program for Older People, by John Scanlon. A how-to-do-it manual. (1978) $5.00.

Long-Range Planning and Budgeting at Colleges and Universities, by Alvin C. Eurich and Sidney G. Tickton. (1973) $1.00.

Management, Governance, and Leadership: A Guide for College and University Administrators, by John D. Millett. Available from Amacom, 135 W. 50th Street, New York, New York, 10020. $15.95.

Never Too Old To Teach, by Judith Murphy and Carol Florio. (1978) $5.00.

Planning in Higher Education: A Manual for Colleges and Universities, edited by John D. Millett. (1977) $10.00.

The Campus: Can Higher Education Still Afford It? An examination of the state of the campus. (1980) Price to be announced.

The Economy of Energy Conservation in Educational Facilities. Topics include the identification and correction of structural energy waste sources, selection of energy cost-efficient electrical and mechanical equipment, solar-generated heating systems, and cost-benefit analysis. (1978, revised) $4.00.

The Energy Handbook. Descriptions of the most effective and innovative ideas that colleges and universities are using to confront the problem of energy conservation. (1980) $12.00.

The Graying of the Campus. Designed to assist educators and administrators plan programs for successful integration of older persons on campus. (1978) $8.00.

The Idea Handbook for Colleges and Universities. A compendium of imaginative, practical, and timely ideas on management, enrollment, curriculum, finance, scheduling, instructional technology, inter-institutional cooperation, etc. (1979) $10.00.

The Neglected Majority: Facilities for Commuting Students. (1977) $4.00.

Space Costing: Who Should Pay for the Use of College Space? (1977) $4.00.